

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOSEPH MORI,

Defendant.

**IDENTITY AFFIDAVIT**

25 Mag. 1928

SOUTHERN DISTRICT OF NEW YORK, ss.:

SCOTT PUGMIRE, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation ("FBI"), and charges as follows:

On or about June 4, 2025, the United States District Court for the District of Utah issued a warrant for the arrest of "Joseph Mori" (the "Warrant") based on an indictment charging "Joseph Mori" with violating 18 U.S.C. § 1956(h) (Money Laundering Conspiracy) and 18 U.S.C. § 1957 (Transacting in Criminal Proceeds) (the "Indictment"). Copies of the Warrant and Indictment are attached as Exhibit A and Exhibit B, respectively, and are incorporated by reference herein.

I believe that JOSEPH MORI, the defendant, who was arrested on or about June 11, 2025, in the Southern District of New York, is the same person as the "Joseph Mori" who is wanted by the United States District Court for the District of Utah.

The bases for my knowledge and the foregoing charge are, in part, as follows:

1. I am a Task Force Officer with the FBI. I have been personally involved in determining whether JOSEPH MORI, the defendant, is the same individual as the "Joseph Mori" named in the Warrant. Because this Affidavit is being submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where the contents of documents or records and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

2. Based on my review of documents from the United States District Court for the District of Utah, I know that on or about June 4, 2025, the United States District Court for the District of Utah issued the Warrant based on the Indictment.

3. On or about June 11, 2025, at approximately 6:00 a.m., other law enforcement agents and I arrested JOSEPH MORI, the defendant, at a residential building in Wappingers Falls, New York (the "Residential Address").

4. Based on my participation in this arrest, my conversations with other law enforcement officers, and my review of law enforcement records, I believe that JOSEPH MORI,

the defendant, is the same person as the “Joseph Mori” wanted in the District of Utah based on the following:

a. At the time of the arrest, JOSEPH MORI, the defendant, said that his name is “Joseph Mori” and stated his date of birth, both of which match the name and date of birth of the “Joseph Mori” who is wanted in the District of Utah.

b. I have reviewed a photograph of the “Joseph Mori” wanted in the District of Utah from law enforcement records. I believe the person depicted in the photograph is JOSEPH MORI, the defendant, whom I arrested at the Residential Address.

5. Accordingly, I believe that the “Joseph Mori” sought in the Warrant is JOSEPH MORI, the defendant.

WHEREFORE, I respectfully request that JOSEPH MORI, the defendant, be imprisoned or bailed, as the case may be.



SCOTT PUGMIRE  
Task Force Officer  
Federal Bureau of Investigation

Sworn to before me this 11th day of June, 2025.



THE HONORABLE JUDITH C. McCARTHY  
United States Magistrate Judge  
Southern District of New York

## **Exhibit A**

# United States District Court

for the  
District of Utah

UNITED STATES OF AMERICA

v.

Case No: 2:25-cr-00225-001 DBB

**SEALED**

## ARREST WARRANT

To: The United States Marshal  
and any authorized law enforcement officer

YOU ARE HEREBY COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) JOSEPH MORI,

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information  
☐ Complaint    ☐ Order of court    ☐ Violation Notice    ☐ Probation Violation Petition  
☐ Supervised Release Violation Petition

This offense is briefly described as follows:

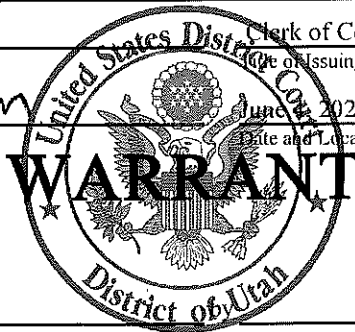
**MONEY LAUNDERING - FEDERAL STATUTES, OTHER/Money Laundering Conspiracy  
CONTINUING CRIMINAL ENTERPRISE/Transacting in Criminal Proceeds**

in violation of 18 U.S.C. 1956(h) and 18 U.S.C. 1957 United States Code.

Gary P. Serdar  
Name of Issuing Officer

*Jennifer Jensen*  
Signature of Issuing Officer

By: Jennifer Jensen  
Generalist Clerk



Bail fixed \_\_\_\_\_ Name of Judicial Officer \_\_\_\_\_

### RETURN

This warrant was received and executed with the arrest of the above-named defendant at \_\_\_\_\_

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

## **Exhibit B**

FELICE JOHN VITI, Acting United States Attorney (#7007)  
CARL D. LESUEUR, Assistant United States Attorney (#16087)  
Attorneys for the United States of America  
Office of the United States Attorney  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682  
Email: carl.lesueur@usdoj.gov

**SEALED**

FILED US District Court-UT  
JUN 04 '25 PM 12:13

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH MORI,

Defendant.

Case: 2:25-cr-00225  
Assigned To : Barlow, David  
Assign. Date : 6/3/2025

INDICTMENT

Count 1: 18 U.S.C. § 1956(h) [Money  
Laundering Conspiracy]  
Count 2: 18 U.S.C. § 1957 [Transacting  
in Criminal Proceeds]

The Grand Jury Charges:

1. At all times relevant to this Indictment, the Defendant Joseph Mori was a resident of the state of New York who was under supervised release following a wire fraud conviction in the Southern District of New York. Specifically, on April 20, 2022, a judgment was entered sentencing him to 12 months' imprisonment followed by three years of supervised release.

2. While on supervised release, in the District of Utah and elsewhere, MORI entered into a conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h). This money laundering was in assistance of a scheme to defraud a Utah

municipality and a minor victim of a swimming accident. The municipality and the minor victim had reached a settlement regarding an accident at a community pool.

3. MORI agreed with others that he would receive and transfer funds on their behalf, knowing that his coconspirators had been “red-flagged” by legitimate banking institutions. MORI’s coconspirators inserted themselves into communications between the parties’ lawyers, and, while pretending to be representatives of the minor victim, instructed the settlement funds should be paid to MORI’s business account.

4. On October 26, 2023, MORI received the fraudulently diverted settlement funds (\$779,600) from a Utah Bank account into a Thread Bank account for his New York entity, Global Office Group Inc. MORI then proceeded to use those funds for personal purposes, including gas, self-storage, and payment of restitution he owed in his prior criminal case.

5. On October 30, 2023, MORI also used the fraud proceeds to transfer \$50,000 from his Thread Bank account to his account at U.S. Bank. He then used the funds for personal expenses, such as his credit card bills.

**COUNT 1**

18 U.S.C. § 1956(h)  
(Money Laundering Conspiracy)

6. Paragraphs 1 through 5 are repeated and realleged as though fully set forth herein.

7. From on or about a date that is unknown but believed to be no later than October 26, 2023, and continuing to an unknown date believed to be no earlier than December 31, 2023, in the District of Utah,

JOSEPH MORI

defendant herein, did knowingly agree with at least one or more other persons with identities unknown to the Grand Jury to engage in money laundering by:

(a) conducting or attempting to conduct a financial transaction knowing the property involved represents the proceeds of some form of unlawful activity (which in fact involves the proceeds of specified unlawful activity, specifically, wire fraud in violation of 18 U.S.C. § 1343), knowing the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. 1956(a)(1)(B)(i); and

(b) knowingly engaging in a monetary transaction in criminally derived property of a value greater than \$10,000, which is in fact derived from specified unlawful activity (Wire fraud in violation of 18 U.S.C. § 1343) in violation of 18 U.S.C. § 1957;

all in violation of 18 U.S.C. § 1956(h).

**COUNT 2**

18 U.S.C. § 1957

(Monetary Transaction Involving \$10,000 In Criminal Proceeds)

8. Paragraphs 1 through 7 are repeated and realleged as though fully set forth herein.

9. On or about October 30, 2023, in the District of Utah and elsewhere,

JOSEPH MORI

defendant herein, did knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, to wit, a transfer of \$50,000 from a Thread Bank account for Global Office Group, Inc. to a U.S. Bank account for Global Office Group Inc. involving more than \$10,000 of funds fraudulently obtained from the District of Utah, which funds were in fact derived from specified unlawful activity, specifically wire fraud in violation of 18 U.S.C. § 1343.

**NOTICE OF INTENT TO SEEK FORFEITURE**

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. §§ 1956 and 1957, the defendant shall forfeit to the United States of America any property, real or personal, involved in the offense, and any property traceable to such property.

[continued on following page]

The United States may seek a forfeiture money judgment and may seek to forfeit substitute property to satisfy such a judgment.

A TRUE BILL:

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FOREPERSON OF GRAND JURY

FELICE JOHN VITI  
Acting United States Attorney

Carl D. Lesueur  
CARL D. LESUEUR  
Assistant United States Attorney